

www.frontieronline.com

Legal Department 180 South Clinton Avenue Rochester, NY 14646-0700

Tel: 585.777.7270 Fax: 585.263.9986

gregg.sayre@frontiercorp.com

# VIA FCC ELECTRONIC COMMENT FILING SYSTEM

September 7, 2007

### **Ex Parte Presentation**

Ms. Marlene Dortch Office of the Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

Re: Petitions of the Frontier and Citizens ILECs, the Embarq Local Operating Companies, AT&T Inc. and BellSouth Corporation for Forbearance from Title II and Computer Inquiry Rules with Respect to their Broadband Services, WC Docket Nos. 06-125 and 06-147

Dear Ms. Dortch:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. §1.1206, Citizens Communications Company and its Frontier Communications subsidiaries provide notice of ex parte communications that were mailed and e-mailed on September 6, 2007. The communications were letters from Maggie Wilderotter, Chairman and CEO of Citizens Communications Company to each of the commissioners. Copies of the letters are attached hereto and filed herewith.

Respectfully submitted,

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Gregg C. Sayre

Associate General Counsel -

Eastern Region

GCS/hmj Attachments (5)





A CITIZENS COMMUNICATIONS COMPANY

September 5, 2007

Chairman Kevin J. Martin Federal Communications Commission 445 12<sup>th</sup> Street SW, 8<sup>th</sup> Floor Washington, DC 20554

Re: WC Docket No. 06-147; Frontier Communications Petition for Forbearance from Title II and Computer Inquiry Requirements for Broadband Services

#### Dear Chairman Martin:

I wanted to contact you regarding Frontier Communications' petition regarding the above mentioned docket in which we are seeking regulatory forbearance for our company's commercial broadband transmission services and strongly urge you to grant this petition. Providing Frontier with regulatory relief, which is similar to that already provided to Verizon, will permit the consumers in our markets to have the ability to enjoy benefits of a truly competitive broadband market and removes the shackles of pricing regulation. Granting Frontier's petition for forbearance is a natural progression of broadband deregulation and is in the public interest.

Frontier is not the dominant broadband provider in any of the relevant markets in terms of addressable market share. Frontier faces competition in its serving areas from alternative facilities-based, broadband competitors as well as providers that purchase special access DS1 or DS3 services from Frontier. The companies, in turn, bundle broadband services, such as Ethernet service, to the customer over those connections. In many cases these are cable television operators or national telecommunications providers who have access to financial resources many times greater than Frontier. The fact that there is less regulation on these entities provides advantages to competitors with greater resources than Frontier in the largest growth area in our industry, broadband.

Sincerely,



A CITIZENS COMMUNICATIONS COMPANY

September 5, 2007

Commissioner Jonathan S. Adelstein Federal Communications Commission 445 12<sup>th</sup> Street SW, 8<sup>th</sup> Floor Washington, DC 20554

Re: WC Docket No. 06-147; Frontier Communications Petition for Forbearance from Title II and Computer Inquiry Requirements for Broadband Services

#### Dear Commissioner Adelstein:

I wanted to contact you regarding Frontier Communications' petition regarding the above mentioned docket in which we are seeking regulatory forbearance for our company's commercial broadband transmission services and strongly urge you to grant this petition. Providing Frontier with regulatory relief, which is similar to that already provided to Verizon, will permit the consumers in our markets to have the ability to enjoy benefits of a truly competitive broadband market and removes the shackles of pricing regulation. Granting Frontier's petition for forbearance is a natural progression of broadband deregulation and is in the public interest.

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Sincerely,





A CITIZENS COMMUNICATIONS COMPANY

September 5, 2007

Commissioner Michael J. Copps Federal Communications Commission 445 12<sup>th</sup> Street SW, 8<sup>th</sup> Floor Washington, DC 20554

Re: WC Docket No. 06-147; Frontier Communications Petition for Forbearance from Title II and Computer Inquiry Requirements for Broadband Services

## Dear Commissioner Copps:

I wanted to contact you regarding Frontier Communications' petition regarding the above mentioned docket in which we are seeking regulatory forbearance for our company's commercial broadband transmission services and strongly urge you to grant this petition. Providing Frontier with regulatory relief, which is similar to that already provided to Verizon, will permit the consumers in our markets to have the ability to enjoy benefits of a truly competitive broadband market and removes the shackles of pricing regulation. Granting Frontier's petition for forbearance is a natural progression of broadband deregulation and is in the public interest.

Frontier is not the dominant broadband provider in any of the relevant markets in terms of addressable market share. Frontier faces competition in its serving areas from alternative facilities-based, broadband competitors as well as providers that purchase special access DS1 or DS3 services from Frontier. The companies, in turn, bundle broadband services, such as Ethernet service, to the customer over those connections. In many cases these are cable television operators or national telecommunications providers who have access to financial resources many times greater than Frontier. The fact that there is less regulation on these entities provides advantages to competitors with greater resources than Frontier in the largest growth area in our industry, broadband.

Sincerely,



A CITIZENS COMMUNICATIONS COMPANY

September 5, 2007

Commissioner Robert M. McDowell Federal Communications Commission 445 12<sup>th</sup> Street SW, 8<sup>th</sup> Floor Washington, DC 20554

Re: WC Docket No. 06-147; Frontier Communications Petition for Forbearance from Title II and Computer Inquiry Requirements for Broadband Services

#### Dear Commissioner McDowell:

I wanted to contact you regarding Frontier Communications' petition regarding the above mentioned docket in which we are seeking regulatory forbearance for our company's commercial broadband transmission services and strongly urge you to grant this petition. Providing Frontier with regulatory relief, which is similar to that already provided to Verizon, will permit the consumers in our markets to have the ability to enjoy benefits of a truly competitive broadband market and removes the shackles of pricing regulation. Granting Frontier's petition for forbearance is a natural progression of broadband deregulation and is in the public interest.

Frontier is not the dominant broadband provider in any of the relevant markets in terms of addressable market share. Frontier faces competition in its serving areas from alternative facilities-based, broadband competitors as well as providers that purchase special access DS1 or DS3 services from Frontier. The companies, in turn, bundle broadband services, such as Ethernet service, to the customer over those connections. In many cases these are cable television operators or national telecommunications providers who have access to financial resources many times greater than Frontier. The fact that there is less regulation on these entities provides advantages to competitors with greater resources than Frontier in the largest growth area in our industry, broadband.

Sincerely,





A CITIZENS COMMUNICATIONS COMPANY

September 5, 2007

Commissioner Deborah Taylor Tate Federal Communications Commission 445 12<sup>th</sup> Street SW, 8<sup>th</sup> Floor Washington, DC 20554

Re: WC Docket No. 06-147; Frontier Communications Petition for Forbearance from Title II and Computer Inquiry Requirements for Broadband Services

#### **Dear Commissioner Tate:**

I wanted to contact you regarding Frontier Communications' petition regarding the above mentioned docket in which we are seeking regulatory forbearance for our company's commercial broadband transmission services and strongly urge you to grant this petition. Providing Frontier with regulatory relief, which is similar to that already provided to Verizon, will permit the consumers in our markets to have the ability to enjoy benefits of a truly competitive broadband market and removes the shackles of pricing regulation. Granting Frontier's petition for forbearance is a natural progression of broadband deregulation and is in the public interest.

Frontier is not the dominant broadband provider in any of the relevant markets in terms of addressable market share. Frontier faces competition in its serving areas from alternative facilities-based, broadband competitors as well as providers that purchase special access DS1 or DS3 services from Frontier. The companies, in turn, bundle broadband services, such as Ethernet service, to the customer over those connections. In many cases these are cable television operators or national telecommunications providers who have access to financial resources many times greater than Frontier. The fact that there is less regulation on these entities provides advantages to competitors with greater resources than Frontier in the largest growth area in our industry, broadband.

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